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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION**

J.N., et al.,

Plaintiffs,

v.

OREGON DEPARTMENT OF EDUCATION,
et al.,

Defendants.

Case No. 6:19-CV-00096-AA

PLAINTIFFS' UNOPPOSED MOTION
TO EXTEND PAGE AND WORD LIMITS
FOR MOTION FOR SUMMARY
JUDGMENT AND CONCISE
STATEMENT OF MATERIAL FACT

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7-1(a), counsel for Plaintiffs conferred with counsel for Defendants prior to filing this motion, and Defendants do not oppose the motion. Plaintiffs will not oppose an equivalent request for extension by Defendants.

MOTION

Plaintiffs respectfully request an extension of the 35-page limit for memoranda of law contemplated in Local Rule 7-2(b) for motions for summary judgment and the 1,500 word limit contemplated in Local Rule 56-1(a) for concise statements of material fact. Plaintiffs seek leave to file a memorandum of law in connection with Plaintiffs' Motion for Summary Judgment that is no longer than 50 pages and a concise statement of material fact that is no longer than 2,500 words.

ARGUMENT

Good cause exists for Plaintiffs' request. Given the depth and breadth of the record that has been developed in this case, this case's complexity, and the desire to supply the court with a comprehensive understanding of both the law and facts at issue, Plaintiffs respectfully request permission to extend the page limit in connection with Plaintiffs' Motion for Summary Judgment and its supporting memorandum of law from 35 pages, as contemplated by Local Rule 7-2(b), to no more than 50 pages. Plaintiffs also request permission to extend the word limit in connection with Plaintiffs' Concise Statement of Material Facts from 1,500 to 2,500 words. Plaintiffs have conferred with Defendants regarding this proposed page and word limit extension; Defendants do not oppose this motion.

CONCLUSION

Plaintiffs seek leave to file a memorandum of law in connection with Plaintiffs' Motion for Summary Judgment that is no longer than 50 pages and a concise statement of material fact that is

no longer than 2,500 words. Additionally, Plaintiffs will not oppose an equivalent request from the Defendants for their opposition and cross-motion.

Respectfully submitted,

Dated: March 14, 2023

By: /s/ Hannah Benton Eidsath

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